

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRENT BOYD, MARGENE ADKINS, FRED ANDERSON, CHARLES ANTHONY, LIONEL ANTOINE, HARVEY ARMSTRONG, MIKE AUGUSTYNIAK, JEFF BARNES, LEMUEL BARNEY, THOMAS BEER, ROBERT BELL, MELVIN CARVER, REGINALD CLARK, WILLIAM "BILL" CODY, MARK COOPER, MARK COTNEY, NEAL CRAIG, PETER CRONAN, CRAIG CURRY, MICHAEL "TONY" DAVIS, JOE DELAMIELLEURE, CONRAD DOBLER, KENNETH EASLEY, JR., KEN FANTETTI, LEE FOLKINS, FRED FORSBERG, PHILLIP FREEMAN III, JOE FERGUSON, JR., DERRICK GAFFNEY, JAMES GARCIA, DONNIE GREEN, WILLIE GREEN, ALFRED GROSS, BOBBY HARDEN, JR., CEDRICK HARDMAN, DENNIS HARRAH, CHARLEY HARRAWAY, JAMES HARRELL, CLIFF HARRIS, VICTOR HICKS, DON HORN, JAMES HOUGH, DELLES HOWELL, BRAD JACKSON, CALVIN JACKSON, J. BRUCE JARVIS, LEON "RAY" JARVIS, NOEL JENKE, OLRICK JOHNSON, JR., TROY JOHNSON, TRUMAINE JOHNSON, AARON JONES II, JAMES JONES, STEVE JONES, JOSEPH KAPP, MARK KONAR, MERVIN KRAKAU, PAUL KRAUSE, ROBERT KROLL, CHARLES KRUEGER, BRUCE LAIRD, MACARTHUR LANE, GENE LANG, PETER LAZETICH, ESTATE OF GREGORY LENS, DONALD MACEK, DONALD MANOUKIAN, ROD MARTIN, IRA MATTHEWS III, LEONARD "BUBBA" MCDOWELL JR., JEFF MCINTYRE, DENNIS MCKNIGHT, JON MELANDER, MICHAEL MERRIWEATHER, TERRANCE "TERRY" METCALF, CALEB MILLER, KORY MINOR, DERLAND MOORE, MICHAEL MORTON, CHARLES MYRTLE, MARK NICHOLS, TOMMY NOBIS, KEITH NORD, AUGUST "GUS" OTTO, TERRY OWENS, GARY PADJEN, RANDY RAGON, DAVID RECHER, JERRY ROBINSON, RICK SANFORD, WILLIAM "BILLY" SHIELDS, FRED SMERLAS, CHARLIE SMITH, ARTHUR STILL, BRYAN STOLTENBERG, WILLIAM "BILLY"

CIVIL ACTION NO.

COMPLAINT

JURY TRIAL DEMANDED

TRUAX, CLARENCE VERDIN, PHIL
VILLAPIANO, JEFFREY WALKER,
LARRY WEBSTER, MICHAEL
WEDDINGTON, EDWARD WHITE, JAMES
WILLIAMS, MIKE WOOD, LARRY
WOODS, MARVIN WOODSON,

PLAINTIFFS,

V.

NATIONAL FOOTBALL LEAGUE, and NFL
PROPERTIES LLC,

DEFENDANTS.

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INTRODUCTION

1. This action is brought to seek declaratory relief and damages related to the Defendants' tortious misconduct and voluntary undertaking with regard to the health effects of repeated head impacts, and the injuries consequently suffered by the Plaintiffs who are former National Football League ("NFL" or "League") players. The injuries include sequelae of the concussions and repeated head impacts suffered by the Plaintiffs during their play in the NFL, including traumatic brain injuries and latent neurodegenerative disorders and diseases. The allegations herein, except as to the Plaintiffs themselves, are based on information and belief.

JURISDICTION AND VENUE

2. Jurisdiction is based on 28 U.S.C. § 1332(a)(1), and (b); and 28 U.S.C. § 1332(d)(11). All of the Plaintiffs and all of the Defendants are citizens of different states. The amount in controversy exceeds \$75,000.00, exclusive of interest and costs, for each Plaintiff. The amount in controversy for all Plaintiffs in this mass action exceeds \$5,000,000.00, exclusive of interest and costs. This matter can be tried jointly in that the Plaintiffs' claims involve common questions of law or fact.

3. This Court has personal jurisdiction over the Defendants because they have substantial and continuous business contacts in the Commonwealth of Pennsylvania.

4. Venue is proper pursuant to 28 U.S.C. § 1391(a)(2), and 28 U.S.C. § 1391(b)(2), as a substantial part of the events and omissions giving rise to the claims occurred in this judicial district.

THE PARTIES

5. Plaintiff Brent Boyd ("Boyd") is 54 years old and he resides with his wife in Reno, Nevada. He was an NFL offensive guard who played with the Minnesota Vikings

(1980-86). He has been diagnosed with Chronic Traumatic Encephalopathy ("CTE"). Boyd was one of a handful of former NFL players who testified before the Judiciary Subcommittee of the United States House of Representatives on June 26, 2007, concerning concussions in the NFL. He founded the NFL retired player advocacy group Dignity After Football. Boyd suffered repeated and chronic head impacts during his career in the NFL and as a result, has experienced cognitive difficulties including, but not limited to CTE, headaches, dizziness, loss of memory, suicidal thoughts, fatigue, depression, temporary blindness, and vertigo.

6. Plaintiff Margene Adkins ("Adkins") is 64 years old and resides with his wife in Fort Worth, Texas. He was an NFL wide receiver for the Dallas Cowboys (1970-71), the New Orleans Saints (1972), and the New York Jets (1973). Adkins suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Adkins has experienced cognitive difficulties including, but not limited to headaches, dizziness, and loss of memory.

7. Plaintiff Fred Anderson ("Anderson") is 56 years old and resides with his wife in Kirkland, Washington. He was an NFL defensive end for the Pittsburgh Steelers (1978-79), and the Seattle Seahawks (1980-82). Anderson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Anderson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

8. Plaintiff Charles Anthony ("Anthony") is 59 years old and resides in Fremont, California. He was an NFL line backer for the San Diego Chargers (1974). Anthony suffered repeated and chronic head impacts during his career in the NFL and is at an increased

risk of latent brain disease. As a result, Anthony has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

9. Plaintiff Lionel Antoine ("Antoine") is 61 years old and resides in Biloxi, Mississippi. He was an NFL offensive tackle for the Chicago Bears (1972-78). Antoine suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Antoine has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

10. Plaintiff Harvey Armstrong ("Armstrong") is 51 years old and resides in Norcross, Georgia. He was an NFL nose tackle who played for the Philadelphia Eagles (1982-84), and the Indianapolis Colts (1986-90). Armstrong suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Armstrong has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

11. Plaintiff Mike Augustyniak ("Augustyniak") is 55 years old and resides in St. Johns, Florida. He was an NFL running back who played for the New Orleans Saints (1980), and the New York Jets (1981-84). Augustyniak suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Augustyniak has experienced cognitive difficulties including, but not limited to headaches,

dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

12. Plaintiff Jeff Barnes ("Barnes") is 56 years old and resides with his wife in Stockton, California. He was an NFL linebacker who played for the Oakland/Los Angeles Raiders (1977-87). Barnes was a member of the Raiders' Super Bowl XV and XVIII Championship teams. Barnes suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Barnes has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

13. Plaintiff Lemuel Barney ("Barney") is 66 years old and resides with his wife in Michigan. He was an NFL defensive back who played with the Detroit Lions (1967-77). He was voted NFL Defensive Rookie of the Year in 1967 and was selected to the NFL's 1960s All Decade Team. He was a seven-time Pro Bowl selection (1967-69, 1972-73, 1975-76) and was a seven-time All Pro selection (1967-70, 1972-73, 1975). He was elected to the Pro Football Hall of Fame in 1992. In 1999, Barney was included in the Sporting News's list of the 100 greatest football players. Barney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Barney has experienced cognitive difficulties including, but not limited to headaches, dizziness, irritability, sleep problems, neck and cervical arthritis and associated numbness/tingling.

14. Plaintiff Thomas Beer ("Beer") is 67 years old and resides in Pine Brook, New Jersey. He was an NFL tight end who played for the Denver Broncos (1967-68), and the Boston/New England Patriots (1971-72). Beer suffered repeated and chronic head impacts

during his career in the NFL and is at an increased risk of latent brain disease. As a result, Beer has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, and neck and cervical arthritis.

15. Plaintiff Robert Bell ("Bell") is 63 years old and resides with his wife in North Wales, Pennsylvania. He was an NFL defensive tackle for the Detroit Lions (1971-73), and the St. Louis Cardinals (1974-78). Bell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Bell has experienced cognitive difficulties including, but not limited to headaches, dizziness, and loss of memory.

16. Plaintiff Melvin Carver ("Carver") is 52 years old and resides with his wife in Tampa, Florida. He was an NFL running back for the Tampa Bay Buccaneers (1982-85), and the Indianapolis Colts (1987). Carver suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Carver has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

17. Plaintiff Reginald Clark ("Clark") is 44 years old and resides with his wife in North Carolina. He was an NFL linebacker who played for the Pittsburgh Steelers (1994), and the Jacksonville Jaguars (1995-96). Clark suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Clark has experienced cognitive difficulties including, but not limited to headaches, dizziness, blurry vision, ringing in ears, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

18. Plaintiff William "Bill" Cody ("Cody") is 67 years old and resides in Fairhope, Alabama. He was an NFL linebacker who played for the Detroit Lions (1966), the New Orleans Saints (1967-70), and the Philadelphia Eagles (1972). Cody suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cody has experienced cognitive difficulties.

19. Plaintiff Mark Cooper ("Cooper") is 51 years old and resides in Aurora, Colorado. He was an NFL offensive tackle who played for the Denver Broncos (1983-87), and the Tampa Bay Buccaneers (1987-89). Cooper suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cooper has experienced cognitive difficulties including, but not limited to sleep problems, and neck and cervical numbness/tingling.

20. Plaintiff Mark Cotney ("Cotney") is 59 years old and resides with his wife in Lutz, Florida. He was an NFL defensive back who played for the Houston Oilers (1975), and the Tampa Bay Buccaneers (1976-84). Cotney was selected by the Tampa Bay Buccaneers in the 1976 Expansion Draft and was a member of the original winless 1976 Buccaneers team. Cotney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cotney has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

21. Plaintiff Neal Craig ("Craig") is 63 years old and resides in Ohio. He was an NFL defensive back for the Cincinnati Bengals (1971-73), the Buffalo Bills (1974), and the Cleveland Browns (1975-76). Craig suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Craig has

experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, and numbness/tingling in neck and cervical spine.

22. Plaintiff Peter Cronan ("Cronan") is 56 years old. He was an NFL linebacker for the Seattle Seahawks (1977-81), and the Washington Redskins (1981-85). Cronan was a member of the Washington Redskins Super Bowl XVII Championship team. Cronan suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cronan has experienced cognitive difficulties including, but not limited to headaches, lightheadedness, and dizziness.

23. Plaintiff Craig Curry ("Curry") is 50 years old and resides in Houston, Texas. He was an NFL defensive back for the Tampa Bay Buccaneers (1984-86), and the Indianapolis Colts (1987). Curry suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Curry has experienced cognitive difficulties.

24. Plaintiff Michael "Tony" Davis ("Davis") is 58 years old and resides in Greeley, Colorado. He was an NFL running back for the Cincinnati Bengals (1976-78), and the Tampa Bay Buccaneers (1979-81). In 1977, Davis was voted team MVP by the Bengals. Davis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Davis has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

25. Plaintiff Joseph DeLamielleure ("DeLamielleure") is 60 years old and resides with his wife in Charlotte, North Carolina. He was an NFL offensive guard who played for the Buffalo Bills (1973-79, 1985) and the Cleveland Browns (1980-84). He was selected to

be included in the Wall of Fame for both teams. He was voted Co-Offensive Lineman of the Year in 1973 and the NFLPA/AFC Offensive Lineman of the Year in 1975. In 1977, he received the Forrest Gregg Award as the NFL Offensive Lineman of the Year. He was selected six times to the Pro Bowl (1975-80) and as All Pro (1975-80). DeLamielleure was elected to the Pro Football Hall of Fame in 2003. DeLamielleure suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, DeLamielleure has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, sleep problems, irritability, 60% hearing loss in left ear, neck and cervical spine arthritis and associated numbness/tingling.

26. Plaintiff Conrad Dobler ("Dobler") is 61 years old and resides in Overland Park, Kansas. He was an NFL offensive guard for the St. Louis Cardinals (1972-77), New Orleans Saints (1978-79), and Buffalo Bills (1980-81). He was a six-time Pro Bowl selection (1975-77). Dobler is 90% disabled today, having had nine knee replacement surgeries alone. Dobler suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Dobler has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

27. Plaintiff Kenneth Easley, Jr. ("Easley") is 52 years old and resides in Norfolk, Virginia. He was an NFL defensive back who played for the Seattle Seahawks (1981-87). He was a five-time Pro Bowl selection, four-time All-Pro, was the 1984 NFL Defensive Player of the Year, and a member of the NFL's 1980s All-Decade Team. Easley suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of

latent brain disease. As a result, Easley has experienced cognitive difficulties including, but not limited to dizziness, loss of memory, sleep problems, and numbness/tingling in neck and cervical spine.

28. Plaintiff Ken Fantetti ("Fantetti") is 54 years old. He was an NFL linebacker who played for the Detroit Lions (1979-85). Fantetti suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Fantetti has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

29. Plaintiff Lee Folkins ("Folkins") is 72 years old and resides with his wife in Orlando, Florida. He was an NFL tight end who played for the Green Bay Packer (1961), the Dallas Cowboys (1962-64), and the Pittsburgh Steelers (1965). He was selected to play in the 1963 Pro Bowl. Folkins suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Folkins has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, irritability, and neck and cervical spine numbness/tingling.

30. Plaintiff Fred Forsberg ("Forsberg") is 67 years old and resides in Sammamish, Washington. He was an NFL linebacker who played for the Denver Broncos (1968-73), the Buffalo Bills (1973), and the San Diego Chargers (1974). Forsberg suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Forsberg has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, neck and cervical arthritis and associated numbness/tingling.

31. Plaintiff Phillip Freeman, III ("Freeman") is 49 years old and resides in Tampa, Florida. He was an NFL wide receiver and kick returner for the Tampa Bay Buccaneers (1985-87). Freeman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Freeman has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory.

32. Plaintiff Joe Ferguson, Jr. ("Ferguson") is 61 years old and resides in Bella Vista, Arizona. He was an NFL quarterback for the Buffalo Bills (1973-1984), the Tampa Bay Buccaneers (1988-89), and the Indianapolis Colts (1990). In 1993, Ferguson was inducted into the Buffalo Bills Wall of Fame and his number 12 Jersey was retired in honor of both Ferguson and fellow quarterback Jim Kelly. Ferguson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ferguson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, and irritability.

33. Plaintiff Derrick Gaffney ("Gaffney") is 56 years old and resides in Jacksonville, Florida. He was an NFL wide receiver for the New York Jets (1978-87). Gaffney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gaffney has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling, blurred vision, and ringing in ears.

34. Plaintiff James Garcia ("Garcia") is 67 years old and resides in San Antonio, Texas. He was an NFL defensive end who played for the Cleveland Browns (1965), the New York Giants (1966), the New Orleans Saints (1967), and the Atlanta Falcons (1968).

Garcia suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Garcia has experienced cognitive difficulties.

35. Plaintiff Donnie Green ("D. Green") is 63 years old and resides in Hagerstown, Maryland. He was an NFL tackle who played for the Buffalo Bills (1971-76), the Philadelphia (1977), and the Detroit Lions (1978). D. Green suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, D. Green has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, and numbness/tingling in neck and cervical spine.

36. Plaintiff Willie Green ("Green") is 45 years old and resides with his wife in North Carolina. He was an NFL wide receiver who played for the Detroit Lions (1991-93), the Tampa Bay Buccaneers (1994), the Carolina Panthers (1995-96), and the Denver Broncos (1997-98). Green suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Green has experienced cognitive difficulties including, but not limited to headaches, loss of memory, depression, and sleep problems.

37. Plaintiff Alfred Gross ("Gross") is 50 years old and resides in Phoenix, Arizona. He was an NFL defensive back for the Cleveland Browns (1983-87). Gross suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gross has experienced cognitive difficulties including, but not limited to headaches, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

38. Plaintiff Bobby Harden, Jr. ("Harden") is 44 years old and resides in Lauderhill, Florida. He was an NFL defensive back who played for the Miami Dolphins (1990-93). Harden suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harden has experienced cognitive difficulties including, but not limited to dizziness, loss of memory, and irritability.

39. Plaintiff Cedrick Hardman ("Hardman") is 63 years old and resides in Laguna Beach, California. He was an NFL defensive end who played for the San Francisco 49ers (1970-79), and the Oakland Raiders (1980-81). He is the current all-time sack leader for the San Francisco 49ers franchise, and was a two-time Pro Bowl selection in 1971 and 1975. Hardman was a member of the Raiders' Super Bowl XV Championship team. Hardman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hardman has experienced cognitive difficulties including, but not limited to loss of memory, neck and cervical arthritis and associated numbness/tingling.

40. Plaintiff Dennis Harrah ("Harrah") is 58 years old and resides in Charleston, West Virginia. He was an NFL offensive guard for the Los Angeles Rams (1975-87). He was a six-time Pro Bowl selection (1978-80, 1985-87), and was voted All-Pro (1986). Harrah suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harrah has experienced cognitive difficulties.

41. Plaintiff Charley Harraway ("Harraway") is 67 years old and resides with his wife in Sarasota, Florida. He was an NFL running back who played for the Cleveland Browns (1966-68), and the Washington Redskins (1969-73). In 1966, Harraway was selected by teams in both the AFL and NFL drafts. Harraway suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result,

Harraway has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

42. Plaintiff James Harrell ("Harrell") is 54 years old and resides in Florida. He was an NFL linebacker for the Detroit Lions (1979-86), and the Kansas City Chiefs (1987). Harrell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harrell has experienced cognitive difficulties including, but not limited to headaches, dizziness, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

43. Plaintiff Cliff Harris ("Harris") is 62 years old and resides in Rockwall, Texas. He was an NFL defensive back who played for the Dallas Cowboys (1970-79). He was a six-time Pro Bowl selection (1974-79) and was a four-time All-Pro selection (1975-78). He was voted as a member of the NFL's 1970s All-Decade Team, played in five Super Bowls and is a member of the Dallas Cowboys' prestigious Ring of Honor. In 2004 Harris was a finalist for the Pro Football Hall of Fame. Harris suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harris has experienced cognitive difficulties.

44. Plaintiff Victor Hicks ("Hicks") is 54 years old and resides in Carrollton, Texas. He was an NFL tight end who played for the Los Angeles Rams (1980). Hicks suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hicks has experienced cognitive difficulties.

45. Plaintiff Don Horn ("Horn") is 66 years old and resides in Colorado Springs, Colorado. He was an NFL quarterback who played for the Green Bay Packers (1967-

70), the Denver Broncos (1971-72), and the Cleveland Browns (1973-74). Horn suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Horn has experienced cognitive difficulties including, but not limited to dizziness, impulse control problems, depression, fatigue, sleep problems, irritability, and numbness/tingling in neck and cervical spine.

46. Plaintiff James Hough ("Hough") is 55 years old and resides with his wife in Chaska, Minnesota. He was an NFL offensive guard who played for the Minnesota Vikings (1978-86). Hough suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hough has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, neurological disorder fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

47. Plaintiff Delles Howell ("Howell") is 63 years old and resides with his wife in Monroe, Louisiana. He was an NFL defensive back who played for the New Orleans Saints (1970-72), and the New York Jets (1973-75). Howell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Howell has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, neck and cervical spine arthritis and associated numbness/tingling.

48. Plaintiff Brad Jackson ("Jackson") is 36 years old and resides in Pikesville, Maryland. He was an NFL linebacker who played for the Miami Dolphins (1998), the Baltimore Ravens (1998-01), and the Carolina Panthers (2002). Jackson was a member of the Ravens' Super Bowl XXXV Championship team. Jackson suffered repeated and chronic

head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jackson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

49. Plaintiff Calvin Jackson ("C. Jackson") is 39 years old and resides in Pompano, Florida. He was an NFL defensive back who played for the Miami Dolphins (1994-99). C. Jackson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, C. Jackson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical spine numbness/tingling.

50. Plaintiff J. Bruce Jarvis ("Jarvis") is 62 years old and resides in Sammamish, Washington. He was an NFL center who played for the Buffalo Bills (1971-74). Jarvis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jarvis has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

51. Plaintiff Leon "Ray" Jarvis ("R. Jarvis") is 62 years old and resides with his wife in Brookfield, Wisconsin. He was an NFL wide receiver who played for the Atlanta Falcons (1971-72), the Buffalo Bills (1973), the Detroit Lions (1974-78), and the New England Patriots (1979). R. Jarvis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, R. Jarvis has experienced

cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

52. Plaintiff Noel Jenke ("Jenke") is 64 years old and resides in Brookfield, Wisconsin. He was an NFL linebacker for the Minnesota Vikings (1971), the Atlanta Falcons (1972), and the Green Bay Packers (1974). Jenke suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jenke has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, and stroke (2008).

53. Plaintiff Olrick Johnson, Jr. ("Johnson") is 34 years old and resides in Miami, Florida. He was an NFL linebacker who played for the New York Jets (1999), the Minnesota Vikings (1999), and the New England Patriots (2000). Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Johnson has experienced cognitive difficulties including, but not limited to seizures, epilepsy, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

54. Plaintiff Troy Johnson ("T. Johnson") is 49 years old and resides in Chauvin, Louisiana. He was an NFL wide receiver who played for the St. Louis Cardinals (1986-87), the Pittsburgh Steelers (1988), the Detroit Lions (1989), and the San Diego Chargers (1990). T. Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, T. Johnson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control

problems, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

55. Plaintiff Trumaine Johnson ("Tru. Johnson") is 51 years old and resides with his wife in Baton Rouge, Louisiana. He was an NFL wide receiver who played for the San Diego Chargers (1985-86), and the Buffalo Bills (1987-89). Tru. Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Tru. Johnson has experienced cognitive difficulties including, but not limited to headaches, dizziness, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

56. Plaintiff Aaron Jones II ("Jones") is 44 years old and resides with his wife in Orlando, Florida. He was an NFL defensive end for the Pittsburgh Steelers (1988-92), the New England Patriots (1993-95), and the Miami Dolphins (1996). Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jones has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, and numbness/tingling in neck and cervical spine.

57. Plaintiff James Jones ("J. Jones") is 50 years old and resides in Tampa, Florida. He was an NFL fullback who played for the Detroit Lions (1983-88, 93), and the Seattle Seahawks (1989-92). Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jones has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

58. Plaintiff Steve Jones ("S. Jones") is 60 years old and resides in St. Louis, Missouri. He was an NFL running back who played for the Buffalo Bills (1973-74), and the St. Louis Cardinals (1974-78). S. Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, S. Jones has experienced cognitive difficulties including, but not limited to dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical spine numbness/tingling.

59. Plaintiff Joseph Kapp ("Kapp") is 73 years old and resides with his wife in Los Gatos, California. He was an NFL quarterback who played for the Minnesota Vikings (1967-69), and the Boston Patriots (1970). Kapp was selected to the 1969 Pro Bowl. In September 1969, Kapp set an NFL record by throwing 7 touchdown passes in a single game. Kapp led the Vikings to Super Bowl IV, where they lost to the Kansas City Chiefs. Kapp suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Kapp has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, neurological disorder, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

60. Plaintiff Mark Koncar ("Koncar") is 58 years old and resides with his wife in Alpine, Utah. He was an NFL offensive tackle who played for the Green Bay Packers (1976-81), and the Houston Oilers (1982-83). Koncar suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Koncar has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, depression, suicidal thoughts, fatigue, sleep problems, irritability, and neck and cervical spine arthritis.

62. Plaintiff Paul Krause (“Krause”) is 69 years old and resides with his wife in Minnesota. He was an NFL defensive back for the Washington Redskins (1964-67), and the Minnesota Vikings (1968-79). He was an eight-time selection to the Pro Bowl (1964-65, 69, 71-75), was an eight-time All-Pro selection (1964-65, 68-73, 75), holds the NFL record for career interceptions (81), and was a member of four Super Bowl teams (IV, VIII, IX, XI). He was voted into the Pro Football Hall of Fame in 1998. Krause suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Krause has experienced cognitive difficulties.

64. Plaintiff Charles Krueger (“Krueger”) is 74 years old and resides in Clayton, California. He was an NFL defensive tackle who played for the San Francisco 49ers (1959-73). He was a two-time Pro Bowl selection, and three-time All-Pro. Krueger suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Krueger has experienced cognitive difficulties.

65. Plaintiff Bruce Laird ("Laird") is 61 years old and resides with his wife in Towson, Maryland. He was an NFL defensive back who played for the Baltimore Colts (1972-81), and the San Diego Chargers (1982-83). Laird was selected to the Pro Bowl in 1972, and was voted All-Pro that same year. Laird suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Laird has experienced cognitive difficulties including, but not limited to headaches, loss of memory, depression, sleep problems, and neck and cervical numbness/tingling.

66. Plaintiff MacArthur Lane ("Lane") is 69 years old and resides in Oakland, California. He was an NFL running back who played for the St. Louis Cardinals (1968-71), the Green Bay Packers (1972-74), and the Kansas City Chiefs (1975-78). Lane was selected to the 1970 Pro Bowl. Lane suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lane has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

67. Plaintiff Gene Lang ("Lang") is 49 years old and with his wife resides in Denver, Colorado. He was an NFL running back who played for the Denver Broncos (1984-87), and the Atlanta Falcons (1988-90). Lang suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lang has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, numbness, and tingling in neck and cervical spine.

69. Plaintiff Estate of Gregory Lens (“Lens”) is deceased and was a resident of West, Texas. He was an NFL defensive tackle who played for the Atlanta Falcons (1970-72). Lens suffered repeated and chronic head impacts during his career in the NFL and suffered latent brain disease. Prior to his death, Lens experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, CTE, Alzheimer’s, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, and irritability.

71. Plaintiff Donald Manoukian (“Manoukian”) is 77 years old and resides in Reno, Nevada. He was an NFL offensive guard who played for the Oakland Raiders (1960). Manoukian suffered repeated and chronic head impacts during his career in the NFL and is at an

increased risk of latent brain disease. As a result, Manoukian has experienced cognitive difficulties including, but not limited to headaches, dizziness, vertigo, sleep problems, neck and cervical spine arthritis and associated numbness/tingling.

72. Plaintiff Rod Martin ("Martin") is 57 years old and resides in Manhattan Beach, California. He was an NFL linebacker for the Oakland/L.A. Raiders (1977-88). Martin was a member of the Raiders' Super Bowl XV and XVIII Championship teams, and holds the Super Bowl record for interceptions in one game with three. He was a two-time selection to the Pro Bowl (1983-84), and was a two-time All-Pro selection (1982-84). Martin suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Martin has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, irritability numbness/tingling in neck and cervical spine.

73. Plaintiff Ira Matthews III ("Matthews") is 54 years old and resides in Missouri City, Texas. He was an NFL running back who played for the Oakland Raiders (1979-81). Matthews was named All-Pro in 1979, set a Monday Night Football record with a 104 yard kick-off return for a touchdown (October 25, 1979), and was a member of the Raiders' Super Bowl XV Championship team. Matthews suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Matthews has experienced cognitive difficulties.

74. Leonard "Bubba" McDowell, Jr. ("McDowell") is 44 years old and resides in Richmond, Texas. He was an NFL safety who played for the Houston Oilers (1989-94), and the Carolina Panthers (1995). McDowell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McDowell has

experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, neck and cervical arthritis and associated numbness/tingling.

75. Plaintiff Jeff McIntyre ("McIntyre") is 56 years old and resides in Phoenix, Arizona. He was an NFL linebacker who played for the Denver Broncos (1979), the San Francisco 49ers (1980), and the St. Louis Cardinals (1981-82). McIntyre suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McIntyre has experienced cognitive difficulties including, but not limited to loss of memory, depression, fatigue, sleep problems, neck and cervical spine arthritis and associated numbness/tingling.

76. Plaintiff Dennis McKnight ("McKnight") is 52 years old and resides in San Diego, California. He was an NFL offensive guard who played for the San Diego Chargers (1982-89), the Detroit Lions (1990-92), and the Philadelphia Eagles (1991). McKnight suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McKnight has experienced cognitive difficulties including, but not limited to headaches, loss of memory, depression, suicidal thoughts, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

77. Plaintiff Jon Melander ("Melander") is 44 years old and resides in Victoria, Minnesota. He was an NFL offensive guard who played for the New England Patriots (1991), the Cincinnati Bengals (1992) and the Denver Broncos (1993-94). Melander suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Melander has experienced cognitive difficulties including, but not limited to loss of memory, depression, fatigue, irritability, neck and cervical arthritis and associated numbness/tingling.

78. Plaintiff Michael Merriweather ("Merriweather") is 50 years old and resides in Stockton, California. He was an NFL linebacker for the Pittsburgh Steelers (1982-87), the Minnesota Vikings (1989-92), the New York Jets (1993), and the Green Bay Packers (1993). He is a three-time Pro Bowl selection (1984-86), and a three-time All-Pro Selection (1984-85, 87). Merriweather suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Merriweather has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

79. Plaintiff Terrance "Terry" Metcalf ("Metcalf") is 60 years old and resides in Seattle, Washington. He was an NFL running back who played for the St. Louis Cardinals (1973-77), and the Washington Redskins (1981). Metcalf was selected to 3 Pro Bowls (1974, 1975, and 1977), and was an All-Pro selection in 1975. Metcalf hold the NFL record for number of games with 250+ all purpose yards, with 7. Metcalf suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Metcalf has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

80. Plaintiff Caleb Miller ("Miller") is 31 years old and resides in Florence, Kentucky. He was an NFL middle linebacker who played for the Cincinnati Bengals (2004-07). Miller suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Miller has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems,

depression, suicidal thoughts fatigue, sleep problems, irritability, numbness and tingling in neck and tingling.

81. Plaintiff Kory Minor ("Minor") is 34 years old and resides in Moreno Valley, California. He was an NFL linebacker who played for the Carolina Panthers (1999-2002). Minor suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Minor has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, and numbness/tingling in neck and cervical spine.

82. Plaintiff Derland Moore ("Moore") is 60 years old and resides in Mandeville, Louisiana. He was an NFL defensive tackle for the New Orleans Saints (1973-1985), and the New York Jets (1986). He was selected to play in the 1983 Pro Bowl, set a Saints team record for service with 169 games played, and is a member of the New Orleans Saints Hall of Fame. Moore suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Moore has experienced cognitive difficulties.

83. Plaintiff Michael Morton ("Morton") is 51 years old and resides in Wesley Chapel, Florida. He was an NFL running back who played for the Tampa Bay Buccaneers (1982-84), the Washington Redskins (1985), and the Seattle Seahawks (1987). Morton suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Morton has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, irritability, and numbness/tingling in neck and cervical spine.

84. Plaintiff Charles Myrtle ("Myrtle") is 66 years old and resides in Bethesda, Maryland. He was an NFL running back who played for the Denver Broncos (1967-72), and the San Diego Chargers (1974). Myrtle suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Myrtle has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, neurological disorder, depression, irritability, double vision, neck and cervical arthritis and associated numbness/tingling.

85. Plaintiff Mark Nichols ("Nichols") is 52 years old and resides in Bakersfield, California. He was an NFL wide receiver who played for the Detroit Lions (1981-89). Nichols suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nichols has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, Alzheimer's, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

86. Plaintiff Tommy Nobis ("Nobis") is 68 years old and resides with his wife in Atlanta, Georgia. He was an NFL linebacker who played for the Atlanta Falcons (1966-76). He was the first ever player drafted by the expansion Falcons in 1966 and was voted NFL Defensive Rookie of the Year. He was a five-time Pro Bowl selection (1966-70, 1972), was selected All-Pro (1967), and was voted to the NFL's 1960s All-Decade Team. Nobis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nobis has experienced cognitive difficulties including, but not limited to headaches, loss of memory, dementia, depression, fatigue, sleep problems, numbness/tingling in neck and cervical spine.

87. Plaintiff Keith Nord ("Nord") is 54 years old and resides in Minnesota. He was an NFL defensive back who played for the Minnesota Vikings (1979-85). Nord suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nord has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

88. Plaintiff August "Gus" Otto ("Otto") is 68 years old and resides in Chesterfield, Missouri. He was an NFL linebacker who played for the Oakland Raiders (1965-72). Otto was a member of the Raiders' first Super Bowl team (Super Bowl II), which they lost to the Green Bay Packers. Otto suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Otto has experienced cognitive difficulties including, but not limited to headaches, dizziness, and loss of memory.

89. Plaintiff Terry Owens ("Owens") is 67 years old and resides with his wife in Decatur, Alabama. He was an NFL offensive tackle who played for the San Diego Chargers (1966-75). Owens suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Owens has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, peripheral neuropathy, neck and cervical arthritis and associated numbness/tingling.

90. Plaintiff Gary Padjen ("Padjen") is 53 years old and resides in Carmel, Indiana. He was an NFL linebacker who played for the Baltimore/Indianapolis Colts (1982-87). Padjen suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Padjen has experienced cognitive difficulties

including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

91. Plaintiff Randy Ragon ("Ragon") resides in Lahaina, Hawaii. He was an NFL wide receiver who played for the Buffalo Bills (1978). Ragon suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ragon has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, irritability, neck and cervical spine arthritis and associated numbness/tingling.

92. Plaintiff David Recher ("Recher") is 68 years old and resides in Gilbert, Arizona. He was an NFL center who played for the Philadelphia Eagles (1965-68). Recher suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Recher has experienced cognitive difficulties.

93. Plaintiff Jerry Robinson ("Robinson") is 54 years old and resides in Santa Rosa, California. He was an NFL linebacker who played for the Philadelphia Eagles (1979-84), and the Los Angeles Raiders (1985-92). In 1981 he was selected to the Pro Bowl, and was voted All-Pro. He was also a member of the Eagles Super Bowl XV team. Robinson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Robinson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, and numbness/tingling in neck and spine.

94. Plaintiff Rick Sanford ("Sanford") is 54 years old and resides in Irmo, South Carolina. He was an NFL defensive back who played for the New England Patriots

(1979-1984), and the Seattle Seahawks (1985). Sanford suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Sanford has experienced cognitive difficulties including, but not limited to loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

95. Plaintiff William "Billy" Shields ("Shields") is 58 years old and resides in Poway, California. He was an NFL offensive tackle who played for the San Diego Chargers (1975-83), San Francisco 49ers (1984), and the New York Jets (1985). Shields suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Shields has experienced cognitive difficulties.

96. Plaintiff Fred Smerlas ("Smerlas") is 54 years old and resides in Sudbury, Massachusetts. He was an NFL nose tackle who played for the Buffalo Bills (1979-89), the San Francisco 49ers (1990), and the New England Patriots (1991-1992). Smerlas was a five-time Pro Bowl selection (1980-83, and 1988), Smerlas suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Smerlas has experienced cognitive difficulties.

97. Plaintiff Charlie Smith ("Smith") is 65 years old and resides with his wife in Oakland, California. He was an NFL running back who played for the Oakland Raiders (1968-74), and the San Diego Chargers (1974-75). Smith was a member of the Raiders' first Super Bowl team (Super Bowl II) which lost to the Green Bay Packers. Smith suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Smith has experienced cognitive difficulties including, but not limited to